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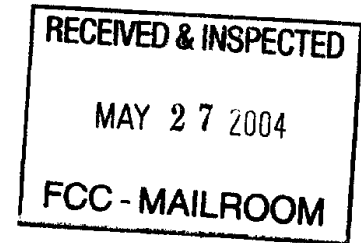


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May 21, 2004



Ms. Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: In the Matter of the Commission's Rules Regarding Modification of  
FM and AM Authorizations (RM-10960)

Dear Ms. Dortch:

The Federal Communications Commission recently announced that it is seeking comments regarding the Petition for Rulemaking (RM-10960) submitted by First Broadcasting Investment Partners, LLC (the "Rulemaking"). The Rulemaking proposes certain amendments to the Commission's rules governing the process for modifying FM and AM radio station licenses and construction permits.

This letter is offered in support of all of the changes requested in the Rulemaking. Because these proposed changes would eliminate inefficiencies and streamline the overall allocations process, we believe it to be in the best interests of station owners, the listening public, and the Commission itself.

Since the last comprehensive review of the FCC's radio allocation procedures in 1982, thousands of new allotments have been awarded through the creation of classes C1, C2, C3 and B, while Class A stations have been permitted to increase power from 3kW to 6kW. In addition, many stations have changed their communities of license.

As a result, the number of FCC allocation proceedings and their associated administrative burdens has grown dramatically. Yet the FCC's processing procedures have remained largely unchanged. Commission staffers are overburdened, the process has slowed, and the original public interest intent of the 1980 procedural changes has been impeded.

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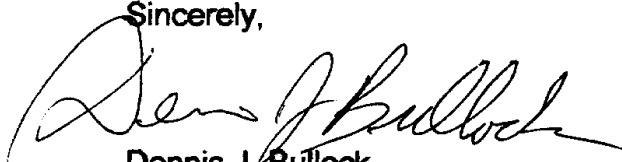


For example, independent operators, who own a disproportionate percentage of disadvantaged signals, often encounter excessive administrative complexity and expense when they seek to improve their signals. The same holds true for minority broadcasters seeking to increase the competitiveness of their stations.

The dedicated professionals in the Commission are also victims of these outdated procedures. They labor under ever-increasing administrative workloads.

Adoption of the First Broadcasting proposals would lift the artificial constraints under which many FCC staffers work today and would represent a major step in the direction of spectrum efficiency. For all the reasons stated above, we wish to express our strong support for the Rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis J. Bullock". The signature is fluid and cursive, with a large initial "D" and "B".

Dennis J. Bullock  
General Manager  
Powell Broadcasting